April 11, 2025

Federal Communications Commission
Washington, DC

IN RE: DELETE, DELETE, DELETE GN Docket No. 25-133

Dear Commission,

On behalf of A2LA, we appreciate the opportunity to provide comments on the public notice aimed at alleviating unnecessary regulatory burdens. Specifically, as it relates to the role that conformity assessment plays within a few of the regulatory programs, and the relationship between FCC and accreditation bodies.

By way of background, A2LA is a non-profit accreditation body with over 4400 actively accredited certificates representing all 50 states as well as internationally. Established in 1978, A2LA provides independent accreditation programs that inspire confidence in the quality of services and acceptance of results from accredited organizations. A2LA has an extensive history of working with government agencies including but not limited to the Environmental Protection Agency, the Consumer Product Safety Commission, the Federal Communications Commission, the Department of Energy, and the Department of Defense.

As requested in the notice, we wish to provide our feedback from the perspective of an accreditation body, who has worked closely with the FCC for several decades.

Specifically, we wish to highlight the importance of the partnerships that are created through FCCs regulatory programs. For example, the FCC Equipment Authorization Program, and the new FCC Cyber Trust Mark. Programs such as these that rely on public-private partnerships to carry out the objectives of the program should be protected. While the notice is looking for examples of unnecessary and inefficient regulatory programs, we felt that it is important to also highlight those that have been successful and whose structure should be an example for other regulatory programs that could be reshaped in order to comply with the goals of this notice.

With one of the goals of this notice being inefficiency, we also wish to bring up a few specific "pain points" within the FCC Equipment Authorization Program that we feel are limiting the effectiveness of the program and we offer solutions that would improve the experience for all the parties involved.

<u>FCC Equipment Authorization Program Requirements</u>

A previous program requirement stated*:*

> *"if the accreditation body re-assesses the test lab and concludes that it continues to meet the requirements set forth under ISO/IEC 17025, the accreditation body will update the expiration date for*

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the test lab's accreditation in the FCC's Equipment Authorization Electronic System (EAS) for a period of up to two years."

While this has been the practice, a recent, informal operational change (sent via email on May 30, 2024) has required accreditation bodies to request that the FCC update expiration dates for each laboratory's renewal of accreditation or extension of accreditation anniversary date.

Unfortunately, this has resulted in increased turnaround times between laboratory renewal (or extension) and the updated expiration date on the FCC website. Previously the accreditation bodies were easily able to make the required expiration date change within 24 hours, ensuring that a lab's recognition status did not lapse on the FCC website. With the new process, we have seen recognitions/extensions take up to twelve weeks to occur. This means that test laboratories may go without FCC recognition for an extended period-of-time that could impact their ability to perform testing and potentially going out of business.

It is important that FCC policies and procedures be stated in rulemaking or guidance documents. As described, some operational policies have been communicated informally via person-to-person emails, telephone, or meetings. This can cause concern when determining appropriate rules and procedures to follow. This also creates an uneven playing field between the parties that are receiving the information instructions, verses those that are not.

We respectfully ask to revert back to the data entry process that was previously being utilized, giving the accreditation bodies the ability to go in and make the changes without the FCC approval, as this change has created an unnecessary burden not only on the FCC resources, but also on the labs who are waiting weeks or months for the approval.

Finally, we request that a change be made to **Title 47 CFR 2.948(e).** See the changes below.

A laboratory that has been accredited with a scope covering the measurements required for the types of equipment that it will test shall be deemed competent to test and submit test data for equipment subject to certification. Such a laboratory shall be accredited by a Commission recognized accreditation organization based on the International Organization for Standardization/International Electrotechnical Commission International Standard ISO/IEC 17025, (incorporated by reference, see § 2.910). The organization accrediting the laboratory must be recognized by the Commission's Office of Engineering and Technology, as indicated in § 0.241 of this chapter, to perform such accreditation based on International Standard ISO/IEC 17011 (incorporated by reference, see § 2.910). ~~*The frequency for reassessment of the test facility and the information that is required to be filed or retained by the testing party shall comply with the requirements established by the accrediting organization, but shall occur on an interval not to exceed two years.*~~ **A sample of the scope of accreditation shall be assessed at least every two years. The laboratory shall be assessed by the accreditation body on a two-year cycle.**

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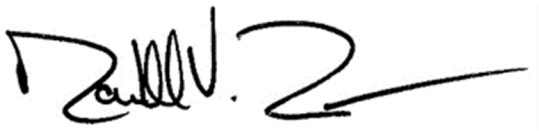
We request that you remove the language that is struck and replace it with the bold language that is taken directly from section 7.9.3 of the ISO/IEC 17011 standard. By making this proposed change, you are allowing for greater flexibility while still being in compliance with the two-year period as required by ISO/IEC 17011. This process may also allow an Accreditation Body to consider a different accreditation cycle which is permissible per ISO/IEC 17011.

We would be pleased to provide more background and elaborate on our comments at your convenience. If interested, please contact me at rquerry@A2LA.org.

Kind regards,



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